



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*86 Chambers Street
New York, New York 10007*

March 31, 2023

BY ECF

The Honorable Colleen McMahon
United States District Judge
500 Pearl Street
New York, NY 10007

Re: *Knight Institute v. Central Intelligence Agency, et al.*, 22 Civ. 1542 (CM)

Dear Judge McMahon:

This Office represents the defendant agencies in this Freedom of Information Act (FOIA) case. As required by the Court's January 31, 2023 order, ECF No. 44, we write to provide a status report on the agencies or components that have been engaged in search or processing since the last status report.

DOJ Criminal Division. Since the last update, CRM has continued to review the remaining universe of records to exclude duplicates, and will continue to do so until it has reviewed all of the remaining pages it has gathered, which it will complete on or before April 28. Once this review is complete, it will process the remaining responsive, non-duplicative pages for any applicable exemptions. CRM has reviewed at least 1,000 pages of records for responsiveness and exemptions since the last report.

DOJ's Office of Information Policy. Since the last update, OIP has nearly completed its initial responsiveness review on the initial results of its second supplemental search. This review is complex because the search was conducted on a classified system. OIP will complete that initial review on or before April 14, 2023, and will provide Plaintiff an update shortly thereafter.

On September 16, 2022, OIP provided an interim response letter noting that OIP had circulated material to other Executive Branch equity holders for consultation. OIP will provide its response to a majority of that material on or before April 28, 2023. The remainder is a small amount of material will require consultation from CRM, which CRM will have returned to OIP and on which OIP will provide its response on or before May 23, 2023.

Proposal. The parties propose that we provide the Court with a further status report by May 31, 2023.

Honorable Colleen McMahon
March 31, 2023

Page 2

We thank the Court for its attention to this matter.

Respectfully submitted,

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